

**Pollution Prevention (P2) Plan “Quick Guide”  
for the Toxic Release category**

**NOTE: Owners or operators of a facility must develop and update a P2 plan for the “Toxic Release” category if the facility is required to report under EPCRA 313 for Toxic Release Inventory (TRI).**

**A complete P2 Plan must contain the following:**

**1. Management Policy**

A statement of facility-wide management policy regarding toxic release reduction.

**2. Production unit analysis.**

- A.** Identification, characterization and accounting of the types and amounts of each TRI chemical(s) released by the facility.
- B.** Identification, analysis and evaluation of any appropriate technologies, procedures, processes, equipment or production changes, that may be utilized by the facility to reduce the amount or toxicity of each TRI chemical(s) released by the facility, including a financial analysis of the costs and benefits of reducing the amount of each TRI chemical(s) released. This portion of the plan must employ the hierarchy of reduction techniques established under § 2302 of the Toxics and Hazardous Waste Reduction Law.
- C.** A strategy and schedule for implementing practicable reduction options for each production process utilized to meet the facility’s reduction goals; and
- D.** A program for maintaining records and management costs for each TRI chemical(s) released.

**Example: Toxic Release Inventory (TRI) chemical #1**

- Describe the chemical substitute, process change or modification, or equipment change or modification that will help reduce the release of this TRI chemical
- Discuss the financial costs (good and bad) associated with implementing the above solution by trying to include “seen” costs (substitute chemical costs, equipment purchase costs, etc) and also the “hidden” costs (process change downtime and training, insurance and liability, employee health benefits, regulatory relief including fines and reporting, economic growth from enhanced corporate image)
- If the above solution is practicable, include a possible timeframe for implementation.

**Toxic Release Inventory (TRI) chemical # 2 (etc. for each TRI chemical)**

Repeat steps B, C, and D above

### 3. Facility Goals

The facility's 2-year numeric goals for reducing the aggregate amount of TRI chemical(s) released by the facility. The goals must be established per unit of product to account for changes in the level of production activity from year to year. (Ex: What are the facility's reduction goals for 2008, 2010 & 2012).

### 4. Internal plan approval

The signature of a senior official with management responsibility for the person or persons completing the plan.

Signed \_\_\_\_\_ Date \_\_\_\_\_

### 5. Employee involvement, awareness and training

An employee awareness and training program consistent with the requirements of § 2306 of the Toxics Law, to involve employees in TRI release reduction planning and implementation to the maximum amount feasible.

#### Example:

- Monthly or annual meetings where employees are notified of the Toxic Release Inventory chemical(s) released by the facility and the efforts the facility is making and will continue to make to reduce them
- Involvement of the employees in the P2 planning process by offering suggestions at meetings, training's or a suggestion box
- Incentive plan for employees to make suggestions, such as monetary awards based on suggestions that end up saving the company money

Not sure if your facility releases any TRI chemicals? Visit EPA's web site for a complete list of TRI chemicals at: <http://www.epa.gov/tri/>

More resource information available at: <http://www.maine.gov/dep/innovation/index.htm>

For assistance with process mapping to identify P2 opportunities call 1-800-789-9802 or visit: <http://www.maine.gov/dep/innovation/contacts.htm>